

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

AECOM ENERGY & CONSTRUCTION,  
INC.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,  
Defendant.

Case No. 20-2016 C

**JOINT STATUS REPORT**

Plaintiff AECOM Energy & Construction, Inc., formerly known as URS Energy & Construction, Inc., (“URS”) and Defendant the United States of America (the “Government”) submit this Joint Status Report pursuant to the Court’s Amended Discovery Scheduling Order. Dkt. 23.

**I. DISCOVERY STATUS**

The parties have continued to collect, review, and produce responsive documents.

URS served its first requests for production of documents on September 27, 2021. As stated in the February 14, 2022 Joint Status Report, the Government made its first production of documents on December 30, 2021, and its second production of documents on January 12, 2022. On March 8, 2022, URS served its second requests for production. The Government made its third production of documents on May 11, 2022, its fourth production of documents on August 12, 2022, and its fifth production of documents on September 30, 2022. The parties have engaged in a meet-and-confer process regarding the scope of the Government’s collection, review and production, including the Government’s proposed custodians and search terms.

The Government served its request for the production of documents on November 12, 2021. As stated in the February 14, 2022 Joint Status Report, URS made its first production of



documents on February 11, 2022. Since then, URS has made six additional productions on March 23, May 6, August 1, September 14, September 27, and September 30, 2022.

## **II. STATEMENT ON SUBSTANTIAL COMPLETION OF DOCUMENT PRODUCTION**

URS represents that it has substantially completed its production of documents in response to the Government's requests for production. The Government represents that it has one additional production that it anticipates serving by the end of October that will substantially complete its production of documents. URS's position is that the scope of production to which the Government has presently committed is insufficient. The parties continue to meet and confer regarding the Government's document production to address disputes including, but not limited to, search terms for Electronically Stored Information ("ESI"), relevant time frames, and the identification of custodians. The parties have been conferring in good faith and will bring any unresolved issues to the Court if the meet-and-confer process fails to resolve their remaining disputes. The parties have also agreed to meet and confer once production is substantially complete to discuss whether the remaining case schedule deadlines should be modified.



September 30, 2022

Respectfully submitted,

/s/ Charles C. Speth

CHARLES C. SPETH, *Counsel of Record*

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Avenue N.W.

Washington, D.C. 20006

Telephone: (202) 663-6000

Facsimile: (202) 663-6363

Email: charles.speth@wilmerhale.com

ANDREW E. SHIPLEY, *Of Counsel*

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Avenue N.W.

Washington, D.C. 20006

Telephone: (202) 663-6000

Facsimile: (202) 663-6363

Email: andrew.shipley@wilmerhale.com

*Attorneys for Plaintiff AECOM Energy &  
Construction, Inc.*

Respectfully submitted,

MICHAEL D. GRANSTON

Deputy Assistant Attorney General

PATRICIA M. MCCARTHY

Director

Lisa M. Donahue

LISA M. DONAHUE

Assistant Director

s/ P. Davis Oliver

P. DAVIS OLIVER

Senior Trial Counsel

BRET VALLACHER

IOANA CRISTEI

Trial Attorneys

Commercial Litigation Branch

Civil Division



Department of Justice  
P.O. Box 480  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 353-0516  
Fax: (202) 307-0972  
P.Davis.Oliver@usdoj.gov

*Attorneys for Defendant*

*Of Counsel:*

BRANDON MIDDLETON  
Chief Counsel  
BRADY L. JONES, III  
Assistant Chief Counsel for Acquisition and  
Litigation  
SKY W. SMITH  
Trial/Procurement Counsel Office of Chief  
Counsel Environmental Management  
Consolidated Business Center  
U.S. Department of Energy